

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILLIAN KLEIN, *et al.*,

Case No. 20-cv-08570-JD

Plaintiffs,

V.

META PLATFORMS, INC.,

Defendant.

DECLARATION OF REBECCA A.
PETERSON IN SUPPORT OF
APPLICATION FOR APPOINTMENT
AS INTERIM LEAD CONSUMER
CLASS COUNSEL BY SHANA E.
SCARLETT OF HAGENS BERMAN
SOBOL SHAPIRO LLP, OR IN THE
ALTERNATIVE, SHANA E.
SCARLETT AND REBECCA A.
PETERSON OF LOCKRIDGE
GRINDAL NAUEN P.L.L.P.

This document relates to:

All Consumer Actions

1 I, Rebecca A. Peterson, hereby declare and state as follows:

2 1. I am an attorney licensed to practice in the State of Minnesota and have been
3 admitted to practice in several courts across the country. For almost a decade I have been an
4 attorney with the firm of Lockridge Grindal Nauen P.L.L.P. (“LGN”), and am currently a partner
5 with LGN. I am counsel of record for Plaintiff Rachel Banks-Kupcho in the above-captioned
6 action.

7 2. I make this declaration in support of Plaintiff Banks-Kupcho’s Motion to Appoint
8 Interim Co-Lead Counsel. I have personal knowledge of the facts set forth herein, and if called as
9 a witness, would testify competently thereto.

10 3. I support the appointment of my co-counsel Shana E. Scarlett as Interim Lead
11 Counsel.

12 4. I am committed to prosecuting this case. If the Court appoints me as co-lead
13 counsel in this litigation, I will devote myself personally to the case’s leadership. My partner
14 Brian Clark will also continue to personally dedicate his time to leadership of this case as he has
15 since its inception along with me.

16 5. Attached as Exhibit A is a copy of Lockridge Grindal Nauen P.L.L.P resume.

17 6. Attached as Exhibit B is a copy of Rebecca A. Peterson’s attorney profile.

18 7. LGN’s background, my own experience, and our client’s significant stake in this
19 litigation give my firm and me a solid foundation by which we can continue to prosecute this
20 case efficiently and expeditiously.

21 8. LGN is committed to developing and fostering a diverse and an inclusive practice
22 environment to reflect the diversity of the clients we serve and our greater community. The firm
23 works to mentor lawyers and provide meaningful opportunities in their practice, and will furnish
24 the same opportunities to collaborating with attorneys from its co-counsel at Hagens Berman in
25 this case. For the past two consecutive years, LGN has been named a Best Law Firm for Women
26 by Working Mother, a recognition given to only sixty firms in the country. LGN is an active
27 member of Twin Cities Diversity in Practice, a local association of more than sixty law firms and

1 corporate legal departments, including those of Fortune 500 companies, committed to creating a
2 vibrant and inclusive legal community. LGN also supports a number of other local affinity bar
3 organizations, including the Diversity Committee of the Minnesota Chapter of the Federal Bar
4 Association, the Minnesota American Indian Bar Association, and the Minnesota Asian Pacific
5 American Bar Association. LGN attorneys also provide pro bono services to a number of
6 different organizations to serve diverse or historically disadvantaged groups and communities,
7 and the firm was awarded the Children's Law Center's Distinguished Service Award in 2011 for
8 its work representing foster care children.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct.

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12 Executed this 3rd day of February 2023, in Minneapolis, Minnesota.

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14 s/ Rebecca A. Peterson
Rebecca A. Peterson

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EXHIBIT A



Exhibit A

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Founded in 1978, Lockridge Grindal Nauen P.L.L.P. ("LGN") has extensive experience in antitrust, securities, environmental, employment, health care, commercial, intellectual property, and telecommunications law. Our clients include agri-businesses, business enterprises, banks, local governments, trade and industry associations, real estate developers, telecommunications providers, health care professionals, and insurers.

LGN is one of the preeminent class action law firms in the country, has vast experience representing banks, financial institutions, shareholders, and other institutional investors in complex litigation, and has extensive experience litigating cases in Minnesota and across the country. LGN attorneys are assisted by more than 20 paralegals and government relations specialists, and an extensive support staff. The firm has its main office in Minneapolis, along with attorneys located across the country.

ANTITRUST EXPERIENCE

LGN practices extensively in antitrust litigation. The firm has litigated major cases and class actions involving price fixing, industry cartels, predatory pricing, price discrimination, and other antitrust and trade regulation issues in courts nationwide. LGN attorneys have been recognized by courts, peer review publications, and other professional organizations as leading antitrust lawyers. Four partners heading LGN's antitrust team were named as Super Lawyers in 2022 and another three attorneys were named Rising Stars by Super Lawyers in 2022.

For 40 years, the firm has prosecuted antitrust cases on behalf of large and small businesses injured by price-fixing and other violations of the antitrust laws. In the last ten years alone, LGN and its co-counsel have recovered more than \$2 billion for their clients and class

members in antitrust cases involving national and global price-fixing schemes. LGN has served as Lead or Co-Lead Counsel in many antitrust class actions, including, for example:

- *In re Pork Antitrust Litigation*, No. 18-cv-01776-JRT-HB (D. Minn.);
- *In re Broiler Chicken Antitrust Litigation*, No. 1:16-cv-08737 (N.D. Ill.);
- *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318 (N.D. Ill.);
- *In re Beef Purchasers Antitrust Litigation* (aka, *Peterson v. JBS USA Food Co. Holdings et al.*), No. 0:19-cv-01129 (D. Minn.);
- *In re Peanut Farmers Antitrust Litigation*, No. 2:19-cv-00463 (E.D. Va.);
- *In re Surescripts Antitrust Litigation*, No. 1:19-cv-06627 (N.D. Ill.);
- *In re Freight Forwarders Antitrust Litigation (Precision Associates, Inc. v. Panalpina World Transport (Holding) Ltd., et al.)*, No. 1:08-cv-42-JG-VVP (E.D.N.Y.);
- *In re Wholesale Grocery Products Antitrust Litigation*, No. 0:09-md-2090 (D. Minn.);
- *In re Air Cargo Shipping Services Antitrust Litigation*, No. 1:06-md-1775-JG-VVP (E.D.N.Y.);
- *In re Potash Antitrust Litigation (II)*, No. 1:08-cv-06910 (N.D. Ill.);
- *In re Flat Glass Antitrust Litigation (II)*, No. 2:08-mc-180-DWA (W.D. Pa.);
- *In re Urethane Antitrust Litigation*, No. 2:04-md-01616-JWL-DJW (D. Kan.);
- *In re Pressure Sensitive Labelstock Antitrust Litigation*, No. 3:03-md-01556-TIV (M.D. Pa.); and
- *In re MSG Antitrust Litigation*, No. 00-md-01328-PAM (D. Minn.).

The firm has also played key roles in dozens of other antitrust class actions across the nation for more than 40 years.

EXHIBIT B



Rebecca A. Peterson

Partner

612-339-6900

rapeterson@locklaw.com

Practices

Securities Litigation

Products Liability & Consumer Fraud Litigation

Education

USD School of Law, 2005

St. Olaf College, 1998

Bar Admissions

Minnesota

California

Court Admissions

U.S. District Court, Northern District of California

U.S. District Court, District of Minnesota

U.S. District Court, District of North Dakota

U.S. District Court, Central District of California

U.S. District Court, Eastern District of California

U.S. District Court, Southern District of California

U.S. District Court, District of Colorado

U.S. District Court, Central District of

Illinois

U.S. District Court, Eastern District of

Wisconsin

Rebecca A. Peterson

Rebecca A. Peterson is a partner in the firm's class action group with a focus on consumer protection, product liability, pet food regulation cases and accompanying regulatory issues. Ms. Peterson has been part of successful prosecution of actions on behalf of consumers in both state and federal courts. Ms. Peterson has been appointed lead counsel and, alongside a group of attorneys, was recognized as Attorney of the Year by Minnesota Lawyer for her work on behalf of U.S. farmers. Prior to joining the firm, Ms. Peterson practiced in California and had extensive experience in complex class actions, appeals and public relations. Ms. Peterson carries that experience over to her practice today in fighting to protect the rights of consumers in both federal and state courts, as well as before regulatory and quasi-regulatory bodies.

Ms. Peterson has extensively litigated consumer cases and conducted and defended dozens of depositions, including expert depositions. In these cases, she vetted and worked extensively with experts, argued class certification motions and dispositive motions, and handled cross-examination in Daubert hearings. Ms. Peterson recently won class certification in a pet food case alleging heavy metals in the dog food. See *Zeiger et al. v. WellPet, LLC et al.*

Ms. Peterson is admitted to the state bar of the States of Minnesota and California. She received her law degree from the University of San Diego School of Law and her B.A. from St. Olaf College. She is an Advisory Board Member of the Page Education Foundation.

Representative Cases

- *Gold, et al. v. Lumber Liquidators, Inc.*, No. 14-cv-05373 (N.D. Cal.)
- *Helmer, et al. v. The Goodyear Tire & Rubber Co.*, No. 1:12-cv-00685-RBJ-MEH (D. Colo.)
- *Hiddlestone, et al. v. The Honest Co. Inc.*, No. 2:16-cv-07054 JAK (AGRx) (C.D. Cal.)
- *Johnson v. Bobcat Co.*, No. 0:15-cv-02097-JRT-HB (D. Minn.)
- *Michael, et al. v. The Honest Company Inc.*, No. 2:15-cv-07059-JAK-AGR (C.D. Cal.)
- *In re Nat'l Hockey League Players' Concussion Injury Litig.*, MDL No. 14-2551 (SRN/JSM) (D. Minn.)
- *Orshan, et al. v. Apple, Inc.* No. 5:14-cv-05659-EJD (N.D. Cal.)

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U.S. Court of Appeals, Second Circuit
U.S. Court of Appeals, Sixth Circuit
U.S. Court of Appeals, Seventh Circuit
U.S. Court of Appeals, Eighth Circuit
U.S. Court of Appeals, Ninth Circuit
U.S. Court of Appeals, Tenth Circuit

- *In re Rust-Oleum Restore Mktg., Sales Practices & Prods. Liab. Litig.*, No. 1:15-cv-1364 (N.D. Ill.)
- *In re Syngenta AG MIR162 Corn Litig.*, No. 14-md-2591-JWL-JPO (D. Kan.)
- *In re Syngenta Litig. (Minn. Producers)*, No. 27-cv-15-3785 (Henn. Co. Dist. Ct., Minn.)
- *Zarinebaf et al. v. Champion Petfoods USA, Inc. et al.*, No. 1:18-cv-06951 (N.D. Ill.)
- *In re Big Heart Pet Brands Litig.*, No. 4:18-cv-00861-JSW (N.D. Cal.) [Co-Lead Counsel]
- *Grossman v. Schell & Kampeter, Inc. et al.*, No. 2:18-cv-02344-JAM-AC (E.D. Cal.)
- *Zeiger et al. v. WellPet LLC et al.*, No. 3:17-cv-04056-WHO (N.D. Cal.)
- *In re Toll Roads Litigation* No. 8:16-cv-00262-ODW-ADS (C.D. Cal)
- *Klein et al. v. Facebook, Inc.* 5:20-cv-08570-LHK (N.D. Cal)
- *Classick v. Schell & Kampeter, Inc.* No. 2:18-cv-02344-JAM-AC (E.D. Cal.)
- *Stuve et al. v. The Kraft Heinze Company*, No. 21-cv-1845 [N.D. Ill.]
- *In re Plum Baby Food Litigation*, 4:21-cv-00913-YGR (N.D. Cal.) [Co-Lead Counsel]
- *In re Crops Input Antitrust Litigation*, 4:21-md-02993 (E.D. MO) [Co-Lead Counsel]
- *In re Nurture Baby Food Litigation*, 1:21-cv-01217-MKV (S.D. NY) [Co-Lead Counsel]
- *Willoughby et al. v. Abbott Laboratories*, 1:22-cv-01322 [N.D. Ill.]

Professional Recognition

- Attorney of the Year (Syngenta litigation team) by Minnesota Lawyer (2017)
- The National Trial Lawyers Top 100 (2021)
- Best Lawyers in Minnesota 2022 by Minnesota Monthly (2022)
- Minnesota Super Lawyers - Class Action and Mass Torts Attorney (2022)
- The National Trial Lawyers Top 100 (2022)

Civic Associations

- Advisory Board Member, Page Education Foundation



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